AO 91 (Rev. 11/11) Criminal Complaint

Task Force Officer: Marvin Anthony

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America George W. Dean, Jr.

Case:2:19-mj-30142 Judge: Unassigned,

Filed: 03-22-2019 At \$

Printed name and title

CMP USA v. DEAN (SO)

CRIMINAL COMPLAINT

	On or about the date(s) of		March 21, 2019 in t		unty of	Genesee	in the
Eastern	District of _	Michigan	, the defenda	ant(s) violated:		ar N	
C	ode Section		•	Offense Descrip	tion		
18 U.S.C. 1591(d) 18 U.S.C. 1512(b)	(1)		Obstructing justice	ce by threatening a	witness		
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	ninal complaint	is based on thes	e facts:		· ·		
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			$\frac{\mathcal{L}}{\mathcal{L}}$	arvin Anthony, Tasl	omplainant's si k Force Office Printed name ar	r (FBI)	V.
	and signed in my pr	esence.		1/	e e e e e e e e e e e e e e e e e e e		

AFFIDAVIT

I, Marvin Anthony, being duly sworn, depose and state the following:

I. INTRODUCTION & AGENT BACKGROUND

- 1. I am employed by the Detroit Police Department as a Police Officer assigned to the Federal Bureau of Investigation (FBI) as a Task Force Officer (TFO), and have been so assigned since October 2018. I am currently assigned to the Southeast Michigan Trafficking and Exploitation Crimes (SEMTEC) Task Force. My duties include the investigation of human trafficking, child exploitation, and violations of other federal statutes. As a federally deputized TFO, I am authorized to investigate violation of the laws of the United States. I am a law enforcement officer with the authority to execute warrants issued under the laws of the United States.
- 2. This affidavit is based on my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. It established probable cause that George W. Dean Jr., date of birth XX/XX/1996, did or attempted to obstruct and interfere with the enforcement of a violation of 18 U.S.C. § 1591(d) (sex trafficking by force, fraud, or coercion), and did or attempted to obstruct

justice by tampering with a witness through the threat of physical force, in violation of 18 U.S.C. § 1512.

II. PROBABLE CAUSE

- 3. Jhamall McGaughy is currently under indictment and scheduled for trial on May 14, 2019, in United States District Court in the Eastern District of Michigan. McGaughy is charged with various offenses, including sex trafficking by force and coercion (18 U.S.C. § 1591), conspiracy to distribute controlled substances (21 U.S.C. § 846), and obstruction of justice by attempting to destroy evidence (18 U.S.C. § 1512). George W. Dean Jr. has been an associate of McGaughy for several years.
- 4. McGaughy is charged with running a prostitution enterprise in order to generate demand and cash for the purchase of controlled substances by prostitutes working under his direction. McGaughy also sold controlled substances to many of the customers of the prostitutes.
- 5. McGaughy controlled the prostitutes by giving the women heroin, crack cocaine, and other controlled substances in order to increase their dependence on the drugs, and then restricting or cutting off access to the controlled substances. By this means, McGaughy kept the women

working for him on the edge of being "dopesick" and therefore willing to do whatever he demanded in order for them to be able to obtain additional doses of the controlled substances. McGaughy also used violence, threats of violence, and other means of coercion to control the women and cause them to engage in commercial sex acts.

- 6. On March 20, 2019, FBI/TFO Andrew Carriger met Dean in Flint, Michigan, and asked to speak with him regarding the McGaughy case. Agent Carriger identified himself and his agency as the FBI. Dean told Agent Carriger that he would speak with him the following week.
- 7. On March 21, 2019, Dean called WIT-1 by using a blocked or private telephone number. WIT-1 is a key witness in the McGaughy case and has known Dean for several years. For the last several months, WIT-1 had blocked Dean's phone number so he could not call her and has also blocked him from contacting her via Facebook.
- 8. WIT-1 answered the phone from the blocked number and recognized Dean's voice. Dean began yelling at her about her involvement in the McGaughy case. Dean told WIT-1 that Agent Carriger and the FBI had spoken to him and that he believed this was due to her providing information against him. Dean told her not to speak with the FBI. Dean

also stated that he had protected WIT-1 from McGaughy in the past but would not protect her anymore. Dean further stated that when McGaughy got out of prison, they were both going to find her and kill her together. Dean also referred to McGaughy's trial date and told WIT-1 that he would be there at the trial, and that she needed to "watch the fuck out."

9. WIT-1 believed that Dean was unaware of her current location, though sometime during the past few days, he began calling her workplace to complain about her. He also lodged a bogus formal complaint with WIT-1's corporate office of WIT-1's employer. Dean filed the complaint using his actual phone number and email address, which WIT-1 recognized. In the complaint, Dean listed the local address where WIT-1 works.

III. CONCLUSION

10. Probable cause exists that on March 21, 2019, George W. Dean did and attempted to obstruct justice by threatening a witness in violation 18 U.S.C. § 1591(d) and 18 U.S.C. § 1512(b)(1).

Marvin Anthony

Task Force Officer

Federal Bureau of Investigation

Subscribed and sworn before me on this 22nd day of March, 2019.

HON. DAVID R. GRAND

United States Magistrate Judge